NOV 14 2023
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT JUDGE JOHNSTON NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION Magistrate Judge Schneider

UNITED STATES OF AMERICA

vs.

Violations: Title 18, United States

Code, Sections 922(a)(6) and 922(d)(1)

ROBERT STOTT

UNDER SEAL

Violations: Title 18, United States

Code, Sections 922(a)(6) and 922(d)(1)

COUNT ONE

The SPECIAL OCTOBER 2022 GRAND JURY charges:

On or about April 15, 2021, at Loves Park, in the Northern District of Illinois, Western Division,

ROBERT STOTT,

defendant herein, in connection with the acquisition of a firearm, namely a Pardus Arms, Model SD, Semi-Automatic Shotgun with serial number P21-A101350, from Madison Guns, located in Loves Park, Illinois, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, did knowingly make a false and fictitious written statement to Madison Guns, which statement was intended and likely to deceive Madison Guns, as to a fact material to the lawfulness of the sale of the said firearm to defendant under Title 18, United States Code, Chapter 44, in that defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that he was the actual buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United State Code, Section 922(a)(6).

COUNT TWO

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about April 22, 2021, at Loves Park, in the Northern District of Illinois, Western Division,

ROBERT STOTT,

defendant herein, did knowingly dispose of a firearm, namely, a Pardus Arms, Model SD, Semi-Automatic Shotgun with serial number P21-A101350, and ammunition to D.F. knowing and having reasonable cause to believe that D.F. had been convicted of a crime punishable by imprisonment for a term exceeding one year;

In violation of Title 18, United States Code, Section 922(d)(1).

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FORFEITURE ALLEGATION

The SPECIAL OCTOBER 2022 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 922(a)(6) as set forth in this Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a Pardus Arms, Model SD, Semi-Automatic Shotgun with serial number P21-A101350.

A TRUE BILL:

FOREFERSON

ACTING UNITED STATES ATTORNEY